

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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	:
SECURITIES INVESTOR PROTECTION	:
CORPORATION,	:
	:
Trustee-Applicant,	: Adv. Pro. No. 08-01789 (BRL)
	:
v.	: SIPA Liquidation
	:
BERNARD L. MADOFF INVESTMENT	: (Substantively Consolidated)
SECURITIES LLC,	:
	:
Defendant.	:
	:
In re:	:
	:
BERNARD L. MADOFF,	:
	:
Debtor.	:
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	:
IRVING H. PICARD, Trustee for the Liquidation	:
of Bernard L. Madoff Investment Securities LLC,	:
	:
Plaintiff,	: Adv. Pro. No. 10-05353 (BRL)
	:
v.	:
	:
NATIXIS, NATIXIS CORPORATE &	:
INVESTMENT BANK (f/k/a IXIS	:
CORPORATE & INVESTMENT BANK),	:
NATIXIS FINANCIAL PRODUCTS, INC.,	:
BLOOM ASSET HOLDINGS FUND, and	:
TENSYR LIMITED,	:
	:
Defendants.	:
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**NOTICE OF TENSYR LIMITED'S MOTION TO DISMISS THE TRUSTEE'S
COMPLAINT OR IN THE ALTERNATIVE TO STAY THE ACTION**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law in Support
of Tensyr Limited's Motion to Dismiss the Trustee's Complaint or in the Alternative to Stay the

Action, the Declaration of Jessica R. Simonoff, dated September 1, 2011, and the exhibit attached thereto, and the pleadings and other papers on file in this action, Tensyr Limited, by its undersigned counsel, will move before the Honorable Burton R. Lifland, United States Bankruptcy Judge, at the United States Bankruptcy Court, One Bowling Green, New York, New York 10004, on December 14, 2011 at 10:00 am, or as soon thereafter as counsel may be heard, for an Order dismissing the complaint filed in the above-captioned action on December 8, 2010 pursuant to Federal Rules of Bankruptcy Procedure 7008, 7009, and 7012, or in the alternative, granting a stay of the action and granting such other and further relief as this Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that any papers in opposition to the motion and in reply in further support of the motion shall be served and filed in accordance with the Stipulation and Order dated and filed in this proceeding on July 11, 2011 [Docket No. 17].

Dated: New York, New York
September 1, 2011

FRESHFIELDS BRUCKHAUS DERINGER
US LLP

By: /s/ David J. Onorato
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